

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

5 *T. J. McCool* 20/14
6 WILLIAM M. McCOOL, Clerk
7 By *[Signature]* Deputy

8
9 UNITED STATES DISTRICT COURT
10 WESTERN DISTRICT OF WASHINGTON
11 AT SEATTLE

12 UNITED STATES OF AMERICA,

CR 14

174-JLR

13 Plaintiff,

14 INDICTMENT

15 v.

16 WILLIAM BURGESS,
17 JOSHUA RIKER, and
18 SADIE OUELLETTE,

19 Defendants.)

20 The Grand Jury charges that:

21
22 **COUNT 1**
23 **(Conspiracy to Distribute Oxycodone)**

24 Beginning at a time unknown, but within the last five years, and continuing
25 through on or about October 11, 2011, in King County, within the Western District of
26 Washington, and elsewhere, WILLIAM BURGESS, JOSHUA RIKER, SADIE
27 OUELLETTE, and others known and unknown, knowingly and intentionally did conspire
28 to distribute oxycodone, a substance controlled under United States Code, Section 812,
Schedule II.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C),
and 846.

1 **ASSET FORFEITURE ALLEGATION**

2 Upon conviction of the offense alleged in Count 1 of this Indictment, WILLIAM
3 BURGESS, JOSHUA RIKER, SADIE OUELLETTE shall forfeit to the United States,
4 pursuant to Title 21, United States Code, Section 853, any property constituting, or
5 derived from, any proceeds obtained, directly or indirectly, as the result of the offense,
6 and also shall forfeit any property used, or intended to be used, in any manner or part, to
7 commit, or to facilitate the commission of the offense.

8 If any of the above-described forfeitable property, as a result of any act or
9 omission of the Defendants,

- 10 1. cannot be located upon the exercise of due diligence;
- 11 2. has been transferred or sold to, or deposited with, a third party;
- 12 3. has been placed beyond the jurisdiction of the Court;
- 13 4. has been substantially diminished in value; or
- 14 5. has been commingled with other property which cannot be divided
15 without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United States Code,
2 Section 853(p), to seek the forfeiture of any other property of the Defendants up to the
3 value of the above-described forfeitable property.

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5 A TRUE BILL:

6 DATED: 6-11-14

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8 *Signature of Foreperson redacted*
pursuant to the policy of the Judicial
Conference of the United States

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10 FOREPERSON

11 
12 JENNY A. DURKAN
13 United States Attorney

14 
15 ANDREW C. FRIEDMAN
16 Assistant United States Attorney

17 
18 FRANCIS FRANZE-NAKAMURA
19 Assistant United States Attorney